

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V draft No. V-01-025
BRAKE PARTS, INC.
STANFORD, KENTUCKY
January 22, 2002
APRIL J. WEBB
Plant I.D. # 21-137-00011
Application Log # 50705 (F910)

SOURCE DESCRIPTION:

This plant manufactures asbestos-free automotive brake components. Metal backing plates are cleaned by sand blasting and painted with a powder coating. Various resins, powdered metals, plastic fibers, fillers, and other compounds are mixed, formed into pads, cured in heated presses, machined into the final shapes. The pads are attached to the metal backing plates with a solvent-borne adhesive.

The material handling, mixing, curing, machining, and painting operations generate particulate matter (PM) emissions. The PM emissions from the mixing, curing, and machining operations are controlled by one or more baghouses. PM emissions from the metal backing plate sandblasting operation is also controlled by a baghouse.

The friction material machining and curing operations generate emissions of various volatile organic compounds, including the hazardous air pollutants phenol, aluminum metals, and formaldehyde. The hydrocarbon emissions from the curing ovens are controlled by afterburners, while the hydrocarbon emissions from the presses and machining operations are not controlled.

COMMENTS:

Control equipment	Efficiency
Baghouse	99.9%
Hepa Filter	99.97%
Cartridge Filter	99.95%

Emission factors are from AP-42, material balances and MSDS.

Upon applicability of the CAM rule, any emission points on the insignificant activities list that have control equipment will be subject to this rule.

The company has requested for monitoring preform material by department instead of by equipment. They have also chosen to do this for the resin mix used in the grinding area.

Applicable regulation

401 KAR 59:010, New process operations applies.

401 KAR 61:132, Existing miscellaneous metal parts and products surface coating operations does not apply because Brake Parts, Inc. is not in a nonattainment area.

401 KAR 63:020, Potentially hazardous matter or toxic substances.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.

Periodic Monitoring:

Opacity readings shall be done quarterly. If visible emissions are perceived, the permittee shall determine the opacity emission by Reference Method 9, initiate an inspection of the control equipment, and make any necessary repairs.

VOC emissions shall be calculated monthly based on paint usage and percent VOC from the MSDS of the paint.